

# Exhibit “1”

**DECLARATION OF**

**Jane Doe 1**

I, **Jane Doe 1**, declare under criminal penalty under the law of Utah that the foregoing is true and correct:

1. I am over the age of eighteen and competent to testify to the statements herein.

2. From approximately 1983 to 1986, while I was 5-8 years old, my siblings and I were sexually assaulted on numerous occasions by my father, **Perpetrator**,

Doe 1, Male Def. & Doe 2, Female Def.

, who were in our local ward, my grandmother, **LS**, and a teenage babysitter, who was also in our ward. There were also other teenagers and adults involved from time to time.

3. The abuse included “touching parties”, which were gathering of adults, teenagers and children. The adults involved were primarily **Perpetrator**, and **D1D & D2D**

My teenage babysitter, who also babysat the **Doe Defs.** children, was named **CW**. When the “touching parties” first started, my younger sister, **Jane Doe 5**, and the daughter of **D1D & D2D**

, who was **Jane Doe 5**’s age, were involved. As I got older, the younger daughter of **D1D & D2D** became involved as did my younger siblings, **Jane Doe 2** and **John Doe 1**. I also remember seeing **BD**, another young girl from the ward, at some of the parties. These parties would happen frequently; sometimes on a weekly basis, sometimes 1-2 times a month. I remember having “touching parties” on Saturday and then going to Church on Sunday and having **D2D**, aka “Sister D2D”, be our primary chorister and having her husband, **D1D**, sit up on the stand since he was in the Bishopric.

4. Typically, the “touching parties” would start with the adults telling us to “put on a show” for them. These shows were usually “dances” that me, **Jane Doe 5** and the oldest daughter of **D1D & D2D** would perform. These dances would always end with us undressing. I remember this is when the applause from the adults and our babysitter would get the loudest. After

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we were naked, the adults (and teenage babysitter) would sexually assault us.

5. This included touching our private parts and penetrating us vaginally and anally with their finger and sometimes using objects like crayons or candy to penetrate us. I recall D1D being the meanest of the adults. He seemed to encourage the others to participate. There were usually treats and bribes involved at every stage of the parties. The fondling included the adults masturbating me and the other children.

6. The adults also forced me and the other children to touch and masturbate them. The adults would refer to the touching as "marriage lessons." I was forced to touch and lick D1D and <sup>Perp.</sup>'s genitals. D1D and <sup>Perp.</sup> did not always get completely naked but would expose their penises and make me touch and suck them. I was also forced to touch the bare breasts of D2D as well as my teenage babysitter, CW

7. It seemed to me that D1D was in charge of the parties and would encourage all of the kids to perform. He would also encourage involvement of the adults. At one of these parties, I saw my father <sup>Perp.</sup> having sex with our babysitter, CW. At another, I saw him having sex with our grandmother, LS.

8. These parties would take place at my house, at D1D & D2D's house, and at my grandmother's house. These parties seemed to happen nearly every time the babysitter would watch us, or when our mom was out of town or away from the house. There were times when my mom and <sup>Perp.</sup> were on a date and the parties would happen at my house with just D1D & D2D, CW and sometimes another older adult man and/or friends of CW being present.

9. When I became older, Jane Doe 2 and John Doe 1 were also present at these parties. I remember Jane Doe 2 being touched. Similar to what happened to Jane Doe 5 and me, there were times when each of these adults penetrated Jane Doe 2's vagina with their fingers. There were other times

when Jane Doe 2 was penetrated with objects.

10. When <sup>John Doe 1</sup> was just over a year old, he became an object at these parties as well. The adults would get <sup>John Doe 1</sup> naked and touch him. They seemed to delight in the fact that they could make <sup>John Doe 1</sup> erect at such a young age. They would put candy on <sup>John Doe 1</sup>'s erect penis and make me and the other kids lick candy off him.

11. The adults started to video tape some of the "touching parties". I recall when we were doing our "dance" and then being undressed that we were being videotaped. The videotaping would continue during the sexual assaults and rapes that I have described above.

12. There were often threats or punishments so that we wouldn't tell anyone what was happening. Some of these threats or punishments included making us drink a concoction containing urine and feces. Other times we were forced to drink coffee. After drinking the coffee, the adults proceeded to shame us for being bad since we were breaking the Word of Wisdom. They explained that since we were wicked, nobody would believe us, so we better not tell anyone.

13. Throughout the years of abuse by my dad, D1D, D2D, and others, I prayed to Heavenly Father for the hurting to stop. After we disclosed the names of our abusers, my mom kicked my dad out of the house. We then spent some time with my Belle and Boppa, my maternal grandparents, at their condo in Hawaii.

14. While I was in Hawaii, my maternal grandmother typed a poem that I wrote about the abuse I suffered at the hands of <sup>Perp.</sup>, D1D & D2D .. The poem is attached as Exhibit A.

15. After returning from Hawaii, I remember being visited by Apostle Neil A. Maxwell. Elder Maxwell was a friend of my maternal grandparents. Elder Maxwell gave me and each of my younger siblings a blessing by laying his hands on my head. During that blessing he said something to the effect that the abusers had made "horrible choices". He talked about how God

would be the judge of these adult abusers and that I needed to forgive.

16. Perp. baptized me when I turned 8 years old, during the time period that he, D1D & D2D and others were doing these terrible things to me. After disclosing the abuse, I expressed a desire to be re-baptized as I believed that my original baptism was tainted and should not count because Perp. was not a worthy priesthood holder. This request for a rebaptism was granted sometime after Elder Maxwell gave me a blessing.

17. As part of my upbringing, I wrote in a journal on an almost weekly basis. In some of my entries, I wrote about the abuse I suffered. Some of the relevant pages are attached as Exhibit B.

Signed on the 22 day of August, 2018, at Derwood (city or county),  
Maryland (state).

Jane Doe 1

  
Signature

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# **Exhibit “A”**

## **to Declaration of**

**Jane Doe 1**

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**Exhibit “A”**

**Exhibit “A”**

**Exhibit “A”**

Jane Doe 1

To Daddy

Daddy I hate you. Daddy I do.  
 You have done wicked things  
 And D2D ~~F~~asntoo.

You have made me suck on your penis  
 And took me to your awful mom's  
 She worse than you  
 You have tricked Mommie.  
 And lied to her too.  
 You took me to <sup>D1D & D2D</sup>  
 And I'd like to hit you.  
 I truly do hate you  
 Way worse than I would hate to eat mud.  
 Daddy I would like to strike you dead  
 But the good part of you I love more than my own head.  
 We're in Hawaii, I miss you so much.  
 We've truly had such great, great fun  
 And read so many stories and had so many treats  
 But Daddy I miss you the most when we're on the beach.

I have not gone snorkeling  
~~\*~~ With Boppa but twice  
 And then we fed the fish  
 Cakes made of rice.  
 I have a new swimming suit  
~~the~~ Light purple with straps  
 That go across my shoulders  
 And then down my back.  
 It also has a frilly skirt  
 Made of two white ruffles that when I play  
 They twirl like a dress on a holliday.

Boppa was here for a week or two  
 And Belle has helped me  
 To tell things about you.  
 We know that D1D & D2D, the Ws and the Ss'  
 Put together would not equal you and Grandma put together.  
 I hated those parties  
 They weren't any fun  
 Even though the treats were quite nummy and fun.  
 I hated the games you forced us to play  
 And the way that you made us ~~do~~  
 Touch your penis olay.

We've rented some movies  
 And popped us some corn  
 And watched the videos  
 With no note of scorn.  
 John Doe 1 threw his glass down  
 And of Belle's dishes broke  
 A glass full of water, and ice on her porch.  
 We've gone on some picnics  
 And played in the waves  
 And gone shopping for games.  
 On the last day that Boppa was here in Hawaii  
 We went shopping and Boppa ran away.

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We finally found him  
With <sup>John Doe 1</sup> and an ice cream cone  
And <sup>John Doe 1</sup> was all happy  
And we ate the chicken to the bone.

Prudential-Bache  
Securities

Public ~~Interest~~  
Daddy I truly miss you.  
And I can't wait til we're home,  
But for now I'm just writing you  
This (Little) poem!

THE END

Jane Doe 1

b Y,

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# **Exhibit “B”**

## **to Declaration of**

Jane Doe 1

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**Exhibit “B”**

**Exhibit “B”**

**Exhibit “B”**

I did a piano solo.

March 1986

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Digitized by srujanika@gmail.com

John Doe 1

170

CW

11

11

17

Complaint

I feel sorry for him  
I think she is trying to  
when I have been  
going to be so fun to be away  
from this home. Other  
disturbing stinkers overall

March 16,

त्रिलोक

All the Town  
said come out

You sentence

We went and saw

going to have

卷之三

卷之三

Many young

~~burn~~ every

I feel

Jane Doe 2

Jane Doe 5

I find out about to go to a new school where  
I went to know my old teacher. I know some but  
I don't know any boy. I am in the same class.  
Morning's putting me in the cabin & had a fun time. We saw  
We went to the river. R.W.

R.W.

We were our 2nd cousins growing up because I have  
I feel bad about growing up & just Playing more  
to leave behind my toys & just Playing more  
interest to friends. And so I start playing more  
attention to my books. But growing up is fun  
too cause your body start changing so you  
start changing & you get smarter.

It was good we told. Even though our  
prayers weren't answered the way we wanted  
them to be. Because we wanted the wicked  
people to just stop without us telling. And I  
told the State president the articles of faith can  
be told or what they meant. He kept telling me  
that I had to know faith. I felt bitter after  
I talked to him. It was like throwing up.

Why didn't you drive me out to Dr. Whitbread  
when I'm feeling bad.

I hope Daddy will get better so that Mommy  
won't get married to somebody else.  
I have a few things to say.

I had a fun time at my party. I had a  
party with my new friends + I found out  
that there is only one girl going to be in my  
class maybe. Probably still be in the other class.  
Aug 17 1999

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And at Raging waters I had fun especially in  
the wave pool.  
I have an excellent aft. at Dr. Whitbeck. I  
talked & I talked & I talked & I talked & Dr.  
Whitbeck said it is talk his that good you  
really see some changes. The feelings will  
change color inside.

D1D Yeah, he doesn't get to be his  
testimony or be that kind of tent thing anymore  
& used to make me feel awful. Grandpa was  
scared out! She has a for sale sign in front of  
her house & is trying to sell it & move away. She's  
scared of us! She's going to an ash of braids. It  
makes me feel triumphant! One day we'll pull  
her in our car & show her in our wood burning  
house & keep her there until the police come.

DATE:

John Doe 1

John Doe 2  
John Doe 1

S

A

T

It's good that John Doe 2 was a boy - otherwise they would have made him do it. Don't you feel sorry for him? He'll be raised with this - and they'll take it out on their own kids even more since they don't have so many kids to do it to. That's a blessing from the state president. He said it's all right to get mad at him.

Sept 17.

Shoed up the horse today and took teacher Sam Lynn riding good. It was fun. He went to the state fair. It was exciting. We went on a real fun ride. We exchanged Jane Doe 5 -- went on a treat & got a beautiful pint of pie & a treat & got a bottle with a pint of beer. She's been here with me all day. I'm doing great at the rodeo. So far I'm doing great at the rodeo & one girl & I